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Confidential: Yes ☐ No ☐
by / /

ANNOUNCEMENT
for the
TROY OPERABLE UNIT
of the Libby Asbestos Superfund Site

The Montana Department of Environmental
Quality and Tetra Tech EM Inc. invite you to a

Troy Town Meeting
Tuesday, April 29, 2008
7:00 p.m. to 9:00 p.m.
Troy Senior Center
304 N Third St

We will share the results of the 2007
inspections and talk about our plans for 2008.

You are also welcome to visit our office at
303 N Third St
(across from the Senior Center)
Monday through Friday
8:00 a.m. to 4:30 p.m.
(406) 295-9238



Site/ID: LBAS
DE: 38-14-15
Admin. Record: Yes
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Confidential: Yes
Key Words/Comments: Public Mtgs

Town Hall Meeting

Libby Asbestos Superfund Site

Libby City Hall, Ponderosa Room
Tuesday; June 13, 2006; 6-8pm

Agenda

- 1. Introduction –** Ted Linnert
EPA Community Relations Coordinator
- 2. Cleanup & Budget Updates -** Peggy Churchill
EPA Remedial Project Manager
- 3. Project Overview -** Max Dodson
EPA Region 8 Assistant Administrator
- 4. Questions & Answers -** Max & Libby Project Team

**EPA Town Meeting
Cleanup and Budget Updates
Libby Asbestos Site, June 13, 2006**



What is this presentation about?

Community Questions and Answers

- Historical overview and current events update
- Where are we in the Superfund process?
- How is the cleanup going?
- How does the Libby budget work?
- What are the upcoming priorities and plans for the future?

Progress in Libby

**Progress in Libby: Cleanup
Accomplishments**

- EPA arrived in Libby in 1999 and began cleaning up the worst sources of contamination first.
- These major sources were addressed under EPA's Removal Authority
 - Screening Plant, Export Plant, High School and Middle School tracks, the Bluffs, and several heavily contaminated residences
- The Libby Asbestos Site was added to the National Priorities List in 2002

**Progress in Libby: Cleanup
Accomplishments**

- Began a Remedial Investigation to screen 3,500 properties in Libby
- Developed a cleanup approach (documented in the 2003 Action Level and Clearance Criteria Technical Memorandum)
- Built a special asbestos cell at the Lincoln County Landfill
- Addressed the Boat Ramp at Riverside Park, Stimson Central Maintenance Building, the Flyway, BNSF property and several other complicated properties.
- Cleaned up and restored 640 residential or commercial properties to date

Progress in Libby: Investigation

- Medical Screening of over 7,000 participants to help understand exposure pathways and health effects
- Contaminant Screening Study
 - Used to Screen 3,500 properties in Libby
- Performance Evaluation Study
 - Designed to develop and investigate asbestos analytical techniques
- Supplemental Remedial Investigation Sampling Events and Evaluations
 - Designed to answer risk assessment questions and to evaluate EPA's cleanup

Progress in Libby: Communications, Education, Outreach

CAG Property
Questions 11
12 and 13

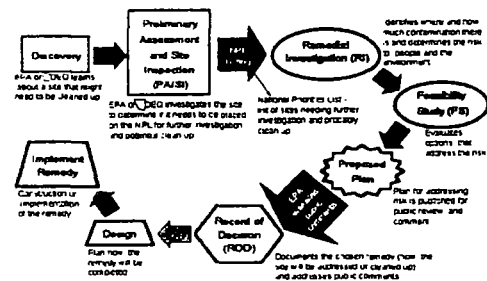
- Opened Info Center to provide on-site assistance with the cleanup and community education
- Provide education and assistance on asbestos-related issues: monthly CAG and TAG meetings, Denver TAG training and technical training in Libby
- Assisted with economic development through local workshops and training programs for target groups
- Raised awareness through monthly newspaper columns, published Q and A's, and public meetings
- Provided an on-site Community Involvement Coordinator for every resident whose property was being remediated

The Superfund Process

Where are we in the process?

- Conducting cleanup under Removal Authority
- Simultaneously conducting a Remedial Investigation in order to issue a Proposed Plan and a Record of Decision
- Currently determining what additional data needs exist
- Will conduct more sampling and investigation for the risk assessment, remedial investigation and feasibility study.

Superfund Remedial Program Process



Focusing on the Baseline Risk Assessment

- What data gaps exist and how can we address them?
- How effective is the cleanup in reducing exposures?
- What potential residual risks are left in the community and at residences once a removal action is complete?
- What cumulative risk exists in Libby?
- How can we improve our understanding of the toxicity of Libby amphibole?

Understanding the Cleanup Process

[illegible]

- 25% of homeowners (154 of 616) have completed the evaluation survey

- Glad they participated – 90%
- Treated w/courtesy and respect – 92%
- Well informed about work – 91%
- Specifics were well-documented – 93%
- Concerns were addressed – 87%
- Satisfied with restoration – 83%

"Each crew did an excellent job with their assigned tasks. I have no complaints. This home is a joy to live now."

"Thank you! You were wonderful and job done were great!"

"I am very pleased with the cleanup of my property. The workers were all very professional and they kept me informed at all times. The garage ramp and the steps to my deck were put back perfectly and the sod that was put down looks great!"

"A great job - well done! The people were all very friendly."

"It's a stressful situation when one has to leave one's property in the hands of strangers. I am grateful it went as well as it did. Thank you."

"Our cleanup couldn't have been handled any better!"

"The work done on my property was great. The job has made my whole place look better. Thank you so much for the great work that was done."

"I was spoiled by the restoration crew workers, etc. They went beyond their call of duty. No complaints."

*Thank you all so much for cleaning up our property and our garage. It is a blessing not to worry about it in our home. You are doing great things for our community. We all thank you. Keep up the Great work!

"Clean-up was good and professional. Being out of our home for the clean-up was hard, but all accommodations and help was excellent. Really appreciate the help."

DELAY and LANDSCAPING

"The worst part of the deal was that I took 8 weeks for our dirt to arrive. I was not satisfied with the way they put my rose garden back together. My husband and I had to redo it. One suggestion - the contractors should have a course in landscaping."

LANDSCAPING

"My dislocation is my lawn and flowerbeds. Grass is lumpy and I am not comfortable walking on it. The dirt used in flowerbeds is mostly clay and needs more water than I normally used."

OUTREACH

"I would like to suggest that the supervisor or foreman in charge of a particular home introduce himself to the owners and state that he/she will be responsible for the detailed clean-up involving the home. This way, the owner has an idea of who the foreman is - plus helps to lower anxiety because the owner of home has one person to talk to."

DAMAGE

"Left large hole about where porta potty was stored and also left ruin in the yard. It is going to take some time to restore my property back to the original condition of it ever came back on it."

CLEANUP CRITERIA

"I was satisfied with everything except that they didn't remove all of the carpets in living room and 1 bedroom and they were the carpets with the asbestos in them and under them."

DELAY

"It was 8 weeks waiting for the top seat. This concerned me only because the orange fences made my residence quite uninviting to piano students, vocal rehearsals, and guests to my home. Other than that problem, everything else was quite satisfactory."

Landscape Issues

- Hydroseeding
- Laying soil
- Installing bedding

Not all counts are technically "bad backs" as we often know we need to return later to complete land clearing.

Touch-ups

- Leaning fences
- Doors
- Wobbly mailboxes
- Settling along foundation
- Poor topsoil
- Trees missing
- Trees returned to wrong location
- Ruts in yard
- Lumps in yards
- Clumpy topsoil

Discussion

- Siding on house
- Water/property lines
- Septic system/drain
- Sprinkler systems
- Ceiling leaks
- Nicks on furniture
- Fish died
- Nest gone
- Food spoiled from unplugged

Clearance

- Why are ALL winter squashes not removed?
 - Why do clearance levels allow some fibers to remain?
- These issues make up less than 10% of all call backs.

Note: Some call backs are determined to be pre-existing conditions and not related to the cleanup/restoration.

- As we have become aware of issues, we have put active programs in place to reduce call backs

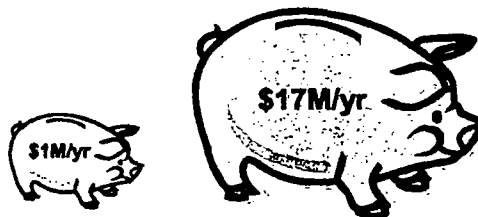
- **On-site CICs.** We increased our numbers of CICs to FOUR in 2006 to better assist residents
 - **Construction Oversight.** We added an additional oversight supervisor to manage quality control
 - **Local EPA Presence.** We hired a Project Manager, Mike Cirian, to more closely manage local project issues
- 90% of call backs are quickly and easily fixed
- The call back rate is dropping: 38% in 2004, 33% in 2005, 23% (so far) in 2006.

EPA's Goal is Continuous Improvement

Understanding the Budget



Two Types of Cash Feed Our Site Budget



Investigation and other \$

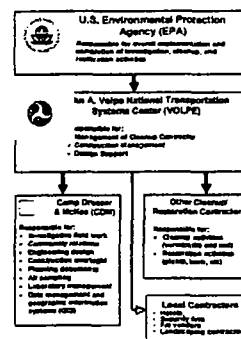
Cleanup \$ from HQ

What Were the Investigation Needs in 2006?

- Libby Remedial Investigation and Risk Assessment
- Outside Reviewers, additional data gathering for risk assessment work
- Troy Asbestos Property Evaluation (TAPE)
 - Troy area property screening, similar to Libby CSS
- Technical Assistance Grant
- Community involvement



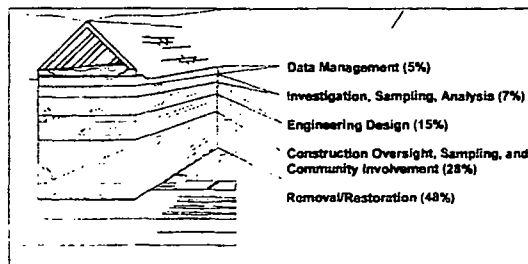
How Do We Spend Our Cleanup Dollars from HQ?



FY2005 Response Action Budget

Cost Component	Activity/Task	FY2005	FY2004	FY2003	% of Total
Direct Cleanup	Channel Construction	\$ 1,178,110	\$ 344,138	\$ 1,522,248	13%
	Channel Operation	\$ 892,171	\$ 812,171	\$ 812,171	7%
	Landscaping, PA & Trench	\$ 151,356	\$ 151,356	\$ 151,356	1%
	Support, Other, Misc	\$ 67,221	\$ 67,221	\$ 67,221	0%
Other Fund and Channel Related Costs	Construction Oversight, Small & Misc	\$ 7,993,371	\$ 842,187	\$ 8,835,557	77%
	Community Involvement	\$ 141,622	\$ 141,622	\$ 141,622	1%
	Remediation	\$ 349,129	\$ 349,129	\$ 349,129	3%
	Security	\$ 71,567	\$ 71,567	\$ 71,567	1%
	HEPA Bags	\$ 104,233	\$ 104,233	\$ 104,233	1%
	Support, Other, Misc	\$ 610	\$ 610	\$ 610	0%
Design	Pre-Construction Investigation, Design	\$ 3,497,333	\$ 3,497,333	\$ 3,497,333	30%
Investigation, Remediation	Site Work, Laboratory, etc.	\$ 2,478,782	\$ 2,478,782	\$ 2,478,782	21%
Construction	Construction Design, Insp, Data Entry, QA	\$ 431,748	\$ 431,748	\$ 431,748	4%
Remediation	Remediation Design, Insp, Data Entry, QA	\$ 126,378	\$ 126,378	\$ 126,378	1%
Support, Other, Misc	Support, Other, Misc	\$ 967	\$ 967	\$ 967	0%
Totals		\$ 16,137,426	\$ 16,137,426	\$ 16,137,426	100%

What Are the Costs Involved in Cleaning Up a House?



How Much Money Is Put Back Into The Local Area Economy?

CAO Economic Impact
Our clients

Direct Local Project Costs (FY05) \$8.8M

- Volpe (travel/supplies) \$128K
- CDM (salaries, expenses, rentals, travels, etc.) \$2M
- Removal Subcontractors (ER, Libby Restoration, SaLUT, MCS) \$5.5M
- Lincoln Co. Landfill \$48K
- Fill/Topsail Contractors \$248K
- Landscaping \$278K
- Security \$303K
- Relocations (hotel, per diem, etc.) \$333K

49% of the
Project Team are
local Libby
residents

Priorities for 2007

- Cleanup 200 properties for the year
- OU4 Baseline Risk Assessment
- Additional Sampling to support the Risk Assessment
- OU4 Remedial Investigation and Feasibility Study
- Troy Asbestos Property Screening
- Work Plan for the Mine Remedial Investigation
- Develop Operations and Maintenance Plan

FY2005 Response Action Budget

Cost Category	Activities/Tasks	Amount	Volpe Direct Costs	Total w/Volpe	% of Total
Direct Cleanup	Cleanup Contractors	\$ 5,578,510	\$ 344,138	\$ 5,922,648	33%
	Disposal Operations	\$ 852,171		\$ 852,171	5%
	Landscaping, Fill & Topsoil	\$ 551,356		\$ 551,356	3%
	Supplies, Other, Misc.	\$ 67,221		\$ 67,221	0%
		\$ 7,049,258	\$ 344,138	\$ 7,393,396	41%
Other Field and Cleanup Related Costs	Construction Oversight, Sampl. & Analy.	\$ 3,983,571	\$ 862,187	\$ 4,845,757	27%
	Community Involvement	\$ 141,623		\$ 141,623	1%
	Relocation	\$ 349,329		\$ 349,329	2%
	Security	\$ 317,567		\$ 317,567	2%
	HEPA Vacs	\$ 104,233		\$ 104,233	1%
	Supplies, Other, Misc	\$ 910		\$ 910	0%
		\$ 4,897,232	\$ 862,187	\$ 5,759,419	32%
Design	Pre-Design Inspections, Design WP Prep., Construct. WPs	\$ 2,625,709	\$ -	\$ 2,625,709	15%
Investigation, Database, Risk Assessment	Database Dev, Mgt, Data Entry, QA	\$ 431,746	\$ 518,418	\$ 950,164	5%
	Sample Preparation	\$ 136,378		\$ 136,378	1%
	Pre-Construction Samp. & Anal.	\$ 986,117		\$ 986,117	6%
	Supplies, Other, Misc	\$ 987		\$ 987	0%
		\$ 1,555,228	\$ 518,418	\$ 2,073,646	12%
Totals		\$16,127,426	\$ 1,724,743	\$ 17,852,169	100%
Volpe % of Total					10%

Libby Town Hall Meeting

Libby City Hall; Ponderosa Room; 6/13/06; 6-8pm

Talking Points

Project Overview – Max Dodson, EPA R-8 ARA

Transition within EPA Team

- Shuffling the deck: Bert, Kathie, hiring new Team Leader, and toxicologist assignments.

Construction/Cleanup

- Cleanup is our highest priority.
- We've cleaned up over 600 properties and continue to exceed our goals. Our goal for this year is 200+ properties.
- We will continue to seek ways to keep cleanup going at a rapid pace.
- We believe our cleanup is protective of human health and we continue to monitor our work to ensure it remains protective.

Schedule Leading to ROD

- The risk assessment and ROD are our next highest priority.
- They are critical to ensuring the cleanup is protective.
- We continue to evaluate the data available and to identify future data needs.
- We are working at developing the BRA slowly and carefully. It's most important to GET IT RIGHT. It is very complicated and challenging.
- Site Conceptual Model will be presented to Libby residents in July.
- A Qualitative Evaluation identifying any data gaps is due in August.
- In addition to the difficulty of the task, there are several challenges facing us...
 - Workload (DOJ support)
 - Resource Limitations (funding)
 - Time pressures

Ambient Air

- We know this is a very important issue for Libby residents and visitors. It affects your day to day lives and has potential economic impacts. EPA and our contractors continue to live and work in Libby just as you do.
- Ambient air data currently available says that based on a snapshot in time, the level for this pathway is within EPA's acceptable risk range. More data need to be collected.
- Additional data will be collected under an ambient air monitoring program designed to meet EPA's objectives and overall community needs. Those data will be incorporated into a cumulative baseline risk assessment.

Troy

- We plan to start the comprehensive house to house investigation of Troy in 2007.
- MDEQ is conducting the investigation but is working very closely with EPA – the basic approach is similar.
- Cleanup of the Troy School is scheduled to occur this summer (Action Memo in progress).

Mine

- We are developing a preliminary strategy.
- Our negotiations with Grace will be critical to progress at this OU.
- An investigation of the extent of asbestos contamination of tree bark will be included in the Mine OU remedial investigation.
- Bonnie Lavelle, RPM for the Mine OU, will be at the July TAG meeting.

Budget

- Funding is stable at \$17M per year. We feel this is sufficient to continue cleanup and some investigation and other supporting efforts.
- If additional funding needs are identified for RI/FS or cleanup, we will pursue the need with HQ.

Libby Town Hall Meeting

Libby City Hall; Ponderosa Room; 6/13/06; 6-8pm

Talking Points - Addendum

Project Overview – Max Dodson, EPA R-8 ARA

City Trench at former Export Plant Site

- The City of Libby conscientiously informed EPA of their intention to dig this trench at the old Export Plant Site.
- EPA informed the City that it was likely they might run into contaminated soil beneath our 18" cap of clean topsoil and to contact us if/when vermiculite was encountered.
- As predicted, vermiculite was indeed encountered, the City contacted EPA, EPA arrived at the site to monitor the situation.
- Specific care was taken to control and contain contaminated soil as it was removed.
- The contaminated soil was disposed of properly.
- The exposed trench indicates that EPA's remedy of the site was in tact and according to specifications.
- Since the contamination in the excavation appeared widespread beneath our 18" cap, EPA and its contractors took over for the City and closed the project.
- As long as asbestos remains buried, it poses no threat – that is why EPA has established notification procedures for excavations in this area.

Is it safe to live in Libby?

- EPA's ongoing cleanup efforts continue to make Libby a safer place to live.
- EPA has removed the contamination from all the known "hot spots."
- Ambient air data currently available says that based on a snapshot in time, the level for this pathway is within EPA's acceptable risk range.
- EPA has reduced the risk from all known exposure pathways.
- EPA and our contractors continue to live and work in Libby just as you do.

Technical Issues presented to EPA R8 on the Libby Site

Town Hall Meeting by EPA R8

to: Max Dodson, Regional Assistant Administrator, 8EPA-EPR
from: the Libby Area Technical Assistance Group (LATAG)

13 June 2006

Role of LATAG: Represent Libby on All Science-Related Health and Risk Issues to EPA R8

(Focus: help EPA ensure all excess health risks are fully assessed to provide long-term healthy environments)

- Advocate and watchdog of the EPA cleanup process
- Technical reviews, presentations, communication between EPA and Libby on science
- Integrate clinical science and cooperate with medical community

Roles of EPA R8: Emergency Response Removal Actions vs. Remedial Investigation and ROD

- Please explain and clarify purpose, approach, goals and limitations of ER removal authority
- Please explain and contrast the purpose, approach and goals of the EPA Remedial Program

Legal Representation: Question about who represents Libby locally in criminal cases against WR Grace?

- i.e. EPA Office of Regional Council? US Department of Justice? Montana Attorney General?

Technical Suggestions/Questions from the LATAG on behalf of Libby:

1. O&M vision by R8 for Libby to prevent over-exposures

- How will future situations like last week's be handled after EPA is gone?
- Desire a program with minimal burden and least cost to citizens of Libby

2. Pending responses from Region 8 to LATAG's request of April 2006:

- Interim/Contingency ROD - only viable option given the huge uncertainties in risks at Libby
- Consider revisions and re-issuing corrected "comfort/completion letters" to citizens with ER cleanups
- Provide augmented expert teams for improved EPA support of:
 - Science – recent improvements in R8 appear to be a good start
 - Communications – Libby needs support for events and to help unify the community
 - Contracts – Are the layers of contractual support the most efficient and cost effective; i.e., USEPA, Department of Transportation, Volpe, CDM, Subcontractors doing onsite work?

3. **Enhanced science** to create a credible quantitative risk assessment with confident PRGs

(Preliminary Remediation Goals, or Risk-Based Concentrations)

- Exposures: monitoring of cumulative pathways of exposure
 - Enact a similar study design and workplan created ~4 years ago
 - Site Conceptual Models should examine all potentially completed pathways of exposure:
 1. All future and current land-use scenarios
 2. Residual contamination: walls, carpets, yards, crawl spaces, etc.
- Toxicology: determine relative potency and toxic targets of Libby Amphibole vs. chrysotile; e.g., fund and conduct the relative potency study, also created ~4 years ago
 - non-cancer endpoints need EPA RfC & RfD: pleural fibrosis, autoimmunity, etc.
 - NTP at NIEHS may do the research at no cost to R8)
- Analytical Methods: better analyses needed to characterize and quantitate Libby Amphibole
 - evaluate hazards and quantitate shorter fibers
 - produce or refine new methods that lower the MDLs below the RBCs
- Uncertainties: confidence of risk estimates, major data-gaps, sensitivity analyses, etc.
- Epidemiology: Use CARD Outreach and other clinical data used to improve risk analyses
 - Resources for clinical support on analyses of exposure factors for improved risk evaluations
 - Subpopulations available with significant local exposures:
 - 1) former school children - track exposure histories for improved risk assessments
 - 2) 20,000 workers and their families who built the Libby Dam

4. **Other** current technical issues:

- Troy schools have delayed cleanups and uncertain screenings as a sensitive subpopulation
- Public Health Emergency declaration seems warranted for Libby
- Fact Sheets need to be updated, such as “Living with Vermiculite” and pending drafts
- Occupational Safety approaches, such as used by MT highway workers on Highway 37
 - needs to be considered as to necessity for equivalent protection of all workers at Libby
 - Libby Amphibole appears more hazardous than chrysotile, warranting more protection
 - Respirator masks have not all been confirmed to be effective and protective for LA

Questions for Max Dodson
EPA Region 8 Assistant Administrator
Libby Community Advisory Group
May 17, 2006

Property Cleanups

1. In what percentage of the properties cleaned to date do the property owners have continuing difficulties? Could the CAG be given a list of the difficulties
2. How many properties cleaned to date have had post-cleanup sampling? Could the CAG be given a report on the post-sampling results?
3. Is the post-property cleanup sampling done by an independent entity?
4. Does EPA guarantee that property cleanups will be done right?
5. Of the 616 properties cleaned to date, how many have completed the post-cleanup survey?
6. Areas of a contaminated property designated as non-use are not cleaned. How are these designations made?
7. How many properties are affected by the non-use area issue?
8. What is the average per property cost of cleanup?
9. Isn't it cost-effective to clean all contamination the first time rather than leaving some and have to come back later to remove it?
10. Is the decision referenced in the preceding question a local management decision or is there some overriding dictate regarding this topic?
11. How can the community guide or at least have input into EPA's property restoration efforts?
12. Comment at a recent GAC meeting indicates that confidence in the property of at least some people in the Libby community is lagging. Is EPA aware of this?
13. What is EPA doing to restore or enhance confidence in the cleanups?
14. Would EPA support the formation of a cleanup support group, i.e., a group of people to meet and discuss property cleanup issues?
15. Does the law now provide or allow EPA to be assessed a penalty missing cleanup deadlines?

Troy

1. Why hasn't the cleanup of the Troy schools been conducted under the emergency response authority?

Mine and Mill Site

1. The mine, mill and tailings are open to the elements. Why isn't it being cleaned now?
2. When is this work scheduled and exactly what is planned?

Libby Asbestos Toxicity

1. Why hasn't animal laboratory testing been done to establish the toxicity of Libby tremolite asbestos?
2. Is such testing planned and when will it begin/conclude?

Economic Impact

1. Would EPA please publish amount of money it has spent within the city, the county, and surrounding area?
2. How much of the money EPA has spent in Libby been paid to local contractors versus out of town crews?
3. Please provide a detailed breakdown of all current expenses related to the Libby project, including the present payroll in Libby.

Appendix 2

Questions for Max Dodson EPA Region 8 Assistant Administrator Libby Community Advisory Group May 13, 2006

Property Cleanups

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4. Does EPA guarantee that property cleanups will be done right?
5. Areas of a contaminated property designated as non-use are not cleaned. How are these designations made?
6. Isn't it cost-effective to clean all contamination the first time rather than leaving some and have to come back later to remove it?
6. How can the community guide EPA's property restoration efforts?
7. Is EPA aware that the community's confidence in the property cleanups is lagging?
8. What is EPA doing to restore community confidence?
9. Would EPA support the formation of a cleanup support group, i.e., a group of people to meet and discuss property cleanup issues?
10. Of the 616 properties cleaned to date, how many have completed the post-cleanup survey?
11. What is the average per property cost of cleanup?
12. Shouldn't there be a penalty for EPA for missing cleanup deadlines?

Troy

1. Why hasn't the cleanup of the Troy schools been conducted under the emergency response authority?

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Libby Asbestos Toxicity

1. Why hasn't animal laboratory testing been done to establish the toxicity of Libby tremolite asbestos?

Economic Impact

1. Would EPA please publish amount of money it has spent within the city, the county, and surrounding area?"
2. What is EPA present payroll in Libby?